

# Narrative Information Sheet City of Tulsa FY20 Brownfields Cleanup Grant Proposal

1. Applicant Information: City of Tulsa

175 East 2<sup>nd</sup> Street, 15<sup>th</sup> Floor Tulsa, Oklahoma 74103

2. Funding Requested

a. Grant Type Single Site Cleanup

b. Federal Funds Requested

i. Value \$350,000

ii. Cost Share Waiverc. ContaminationNo waiver requestedHazardous Substances

3. Location Tulsa, Tulsa County, Oklahoma

4. Property Information Building 104

103 North Trenton Tulsa, Oklahoma 74120

5. Contacts

a. COT Brownfields Project Director b. Highest Ranking Elected Official

Michelle Barnett Mayor G.T. Bynum

 175 E. 2<sup>nd</sup> Street, Rm 15-040
 175 East 2<sup>nd</sup> Street, 15<sup>th</sup> Floor

 Tulsa, Oklahoma 74103
 Tulsa, Oklahoma 74103

 Phone: 918-596-7457
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Email: <a href="mailto:mbarnett@cityoftulsa.org">mbarnett@cityoftulsa.org</a> Email: <a href="mailto:GT@cityoftulsa.org">GT@cityoftulsa.org</a>

6. Population

a. Population City of Tulsa: 401,352 (ACS, 2017)

# Narrative Information Sheet (continued)

# 7. Other Factors Page #

Community Population is 10,000 of less	-
The applicant is, or will assist, a federally recognized Indian tribe or United	-
States territory	
The proposed brownfields site(s) is impacted by mine-scarred land	-
Secured firm leveraging commitment ties directly to the project and will	3, 7
facilitate completion of the project/redevelopment; secured resource is	
identified in the Narrative and substantiated in the attached documentation	
The proposed site(s) is adjacent to a body of water (i.e., the border of the	-
sites(s) is contiguous or partially contiguous with a body of water but for a	
street, road, or other thoroughfare separating them).	
The proposed site(s) is in a federally designated floodplain.	-
The redevelopment of the proposed cleanup site(s) will facilitate renewable	3
energy from wind, solar, or geothermal energy; or any energy efficiency	
improvement projects.	

8. Letter from State Environmental Authority

See Attached

# **Narrative Information Sheet Attachment:**

Oklahoma Department of Environmental Quality Letter



SCOTT A. THOMPSON **Executive Director** 

# OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

**KEVIN STITT** Governor

November 12, 2019

Ms. Michelle Barnett, P.E. Brownfields Program Manager City of Tulsa, Office of Economic Development 175 East 2<sup>nd</sup> Street, Room 15-040 Tulsa, OK 74103

Subject: State Acknowledgement Letter for the FY20 Brownfields Cleanup Grant Application for Hazardous Substances for the City of Tulsa

Dear Ms. Barnett:

The Oklahoma Department of Environmental Quality (DEQ) acknowledges and supports the City of Tulsa's grant application for an U.S. Environmental Protection Agency Brownfields Cleanup Grant for hazardous substances.

The City of Tulsa plans to abate asbestos, lead-based paint, and low-level radioactive materials from a city-owned building located at 103 North Trenton in Tulsa, Oklahoma. Although this building has been owned by the City for many years, it has been unused due to environmental concerns. The building has been assessed and is shovel ready. The City wishes to clean up the structure for reuse as a business incubator or office space.

The DEQ encourages the voluntary cleanup and reuse of contaminated properties and has successfully partnered with the City on several projects that have had a positive impact on the City of Tulsa. DEQ staff members are available to consult with the City on Brownfields issues and provide technical assistance as needed. For additional information, please contact Heather Mallory at (405) 702-5135. I wish you great success in this endeavor and look forward to working with you in the future.

Sincerely,

Kelly Dixon, Director Land Protection Division



#### 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

# 1.a. Target Area and Brownfields

# <u>1.a.i.</u> Background and Description of Target Area

The City of Tulsa (City or Tulsa) is located in northeast Oklahoma and is the state's 2<sup>nd</sup> largest city. With a population of 401,352, Tulsa is more populous than New Orleans, Pittsburgh, or Cincinnati in a Metropolitan Statistical Area larger than Las Vegas, Honolulu, or Portland. Tulsa's rich character and culture are due to its unique blend of Native American, African American, Hispanic and Latino influences. In addition to Tulsa's rich culture, it has an economic history deeply rooted in the energy industry. Originally part of Indian Territory, Tulsa was first settled between 1828 and 1836 by the Lochapoka Clan of the Muscogee (Creek) Nation and was incorporated as a municipality on January 18, 1898.

Tulsa began its transformation from a sleepy river town of 1,400 people to a metropolis when oil was discovered in 1901. Additional oil discoveries between 1915 and 1920 solidified Tulsa as the "Oil Capital of the World". By 1920 Tulsa's African American community in the downtown Greenwood area had become known as "Black Wall Street" but was destroyed in the 1921 Tulsa Race Massacre. This event remains a significant part of the city's fabric. A few years later, in 1927, Tulsan Cyrus Avery established Route 66, the Mother Road, running from Chicago to Los Angeles with 30 miles through Tulsa. The booming oil market of the time produced petroleum drilling and equipment companies throughout the city and in the Target Area.

The Target Area is the Crutchfield Neighborhood, just north of the early Route 66 corridor, in north Tulsa. According to the Crutchfield Revitalization Master Plan (2003), the neighborhood was initially developed between 1910-1917. In addition to the residential development, there was a significant concentration of industrial and commercial manufacturers in the area who specialized in oil field equipment producing a live-work neighborhood. These were steel production, machining, and heavy industry supported by rail access.

But, by the 1960's the area was beginning to show signs of decline. Suburban sprawl drew residents, new businesses, and tax revenue away from Tulsa's core. After the "oil bust" of the early 1980's the manufacturing jobs declined significantly and several of the industries closed their doors. The Crutchfield area through the 80's and 90's continued to experience decline as evidenced by an increases in deteriorated and abandoned houses, absentee landlords, crime and vandalism. The racial and cultural diversity that once made for a vibrant walkable urban neighborhood became marred by environmental justice issues, blight, health disparities, contamination, and disinvestment.

#### 1.a.ii. Description of the Brownfield Site

Abatement of ACBM, LBP, and low-level radioactive materials the 15,200 square foot Building 104 at the Tulsa Surplus Auction Yard is the topic of this cleanup proposal. The structure was originally constructed as a regional oil equipment company headquarters in 1911. The location in an industrial area near historic Route 66 to the south as well as the architectural character of the structure has created outside interest in its reuse. However, reuse of the structure will require cleanup to enable economic development. The specific request is federal grant award of \$292,000 and 20% local match for a total of \$350,000.

In 2018, a Fire Department Hazardous Materials response to the site found low-levels of radioactive material. A Phase II Assessment was conducted with City of Tulsa's Assessment

Grant funds under an EPA-approved QAPP in 2019. In the Phase II Assessment, ACBM, LBP and radioactive materials for cleanup were identified as shown in Table 1.

**Table 1: Materials for Cleanup** 

Cleanup	Material	Quantity
ACM	Thermal Systems	8,000 SF
ACM	Mastic	32,100 SF
ACM	Floor Tile	16,000 SF
ACM	Sealant	1,000 LF
LBP	Wall Paint	15,000 SF
LBP	Door and Window Frames	80 LF
LBP	Windows	96 units
LBP	Staircase	1 unit
Rad	Stair Treads (Radioluminescent Paint)	16 treads

# 1.b. Revitalization of the Target Area

## 1.b.i.Reuse Strategy and Alignment with Revitalization Plans

Building 104 represents 15,200 sf of vacant manufacturing space in a Moderate Industrial zoned area. The facility is fully infrastructured with power, water, and sewer. The site lies approximately one mile east of downtown Tulsa and adjacent to the BNSF mainline railroad within the Crutchfield Neighborhood, in Tulsa County Census Tract 12, Block 1. The current state of contaminants in this building prevents the space from used for primary jobs. The 2010 Tulsa Comprehensive Plan, which provides the broad framework for property use and development, includes the following two broad goals which have guided selection of this site for cleanup:

"Ensure the region maintains an adequate supply of land to accommodate long-term demand for development". This cleanup would allow reuse of existing buildings and infrastructure in a key area outside FEMA floodplains. The Mayor's 2018 Action & Implementation Management (AIM) Plan, which guides day to day city activities, specifies under its Jobs objective "Determine priority sites for marketing for growth opportunities".

At the neighborhood level, within the Crutchfield Revitalization Master Plan, the goals include advocating for economic development, revitalization and employment with objectives that would be specifically addressed by this grant. The proposed cleanup activities provide a path for collaboration and growth that aligns with the City's overall land use and revitalization plans and supports environmental justice by promoting local entrepreneurial activities.

- "Identify areas that are currently underutilized commercial sites and convert those sites, which could provide office, light manufacturing, and small warehouse facilities".
- "Seek out and develop partnerships to help fund and promote economic development".

As part the application development process, the City of Tulsa consulted with its project partner, the Tulsa Regional Chamber of Commerce, to determine potential project uses and identified potential future use as a business incubator or other office space. We also consulted with local non-profit groups, like Rising Village, which provides training for Burmese refugee women and which is looking for a long-term operational home.

#### 1.b.ii. Outcomes and Benefits of Reuse Strategy

The objective of revitalizing the site is part of a larger effort to ensure Tulsa has adequate real estate option for primary job growth (AIM Plan, 2018) while supporting entrepreneurial

collaboration. The site is located within 0.25 mile of Route 66 in central Tulsa, surrounded by industrial and rail to the north and west, but bounded by vacant land to the east and south. Recently, poor condition warehouses on adjacent parcels have been demolished. As a result, the adjacent parcels are fully infrastructured and shovel-ready for redevelopment. The site location in Tulsa County Census Tract 12, Block 1, is in an IRS-designated Opportunity Zone. Revitalization of the site would further catalyze development on the adjacent properties within the Opportunity Zone in support of the Crutchfield Revitalization Master Plan and the City's AIM Plan goals. Reuse also supports the City's Sustainability Plan as the window putty is ACM and will be replaced in this project, allowing for improved energy efficiency.

# 1.c. Strategy for Leveraging Resources

# 1.c.i. Resources Needed for Site Reuse

Cleanup at this location would stimulate the availability of additional funds for subsequent reuse. With a clean site, the City would be eligible to apply to the Economic Development Administration (EDA) for a grant in support of reuse as a business incubator. In addition, the site is eligible for funding from other sources. Tulsa voters in 2013, 2016 and 2019 approved historic capital improvement projects. The City of Tulsa committed \$1,680,000 for street improvements along this section of Trenton Avenue and its connector streets, as well as \$1,787,000 for rehabilitation of the Utica Avenue, its arterial street. Construction of these improvements are slated to begin in 2020. These improvements are key to ensuring access to the site for employment. A letter stating the City of Tulsa commitment of support is provided as an attachment.

# 1.c.ii. Use of Existing Infrastructure

The site's location in the urban core of the City of Tulsa reflects 100% reuse of existing infrastructure at the project site. In addition, funds committed by the City of Tulsa for rehabilitation of Utica and Trenton Avenues, represent a commitment to reuse of the existing surface transportation that will benefit the area for years to come. No new municipal infrastructure is required for site reuse.

# 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

#### 2.a. Community Need

#### 2.a.i. The Community's Need for Funding

The Target Area is a less populated portion of the city and low-income as shown in the table below. The demographics in Table 2 illustrate that challenges such as high rates of poverty and low median household income are faced not only by the Target Area but also by Tulsa as a whole. These factors limit the surrounding community's ability to carry out the necessary environmental remediation or redevelopment.

Table 2: Community Population Demographics<sup>1</sup>

	nsus Tract 12)	City of Tulsa	Okla.	U.S.A.	
				U.S.A.	
Population	1,957	401,352	3,751,351	326,573,050	
Income <poverty (families)<="" level="" th=""><th>37.6%</th><th>20.8%</th><th>16.2%</th><th>14.6%</th></poverty>	37.6%	20.8%	16.2%	14.6%	
Median Household Income (families)	\$32,644	\$44,577	\$49.767	\$57,652	

<sup>&</sup>lt;sup>1</sup> American Community Survey 2017 estimates at <a href="https://factfinder.census.gov/faces/nav/jsf/pages/community">https://factfinder.census.gov/faces/nav/jsf/pages/community</a> facts.xhtml

The data indicates that the Target Areas are in desperate need of economic growth and higher wages; however, current economic challenges faced by the City of Tulsa only worsen these issues. With this context, creation of primary jobs is a key focus of the Crutchfield Neighborhood Master Plan and economic justice that includes historically under-invested areas of the city will be a focus in 2020 and beyond.

### <u>2.a.ii.</u> Threats to Sensitive Populations

# (1) Health or Welfare of Sensitive Populations

This grant would reduce the threat from hazardous materials to the Target Area, which represents some of Tulsa's earliest industrial complexes along the BNSF mainline and one with the highest potential for hazard exposure. The area scores 97% for lead paint indicators, 94% on EPA's EJSCREEN for hazardous waste proximity, and in the 90%-95% range for cancer risk. The target area in north Tulsa experiences poverty at a rate 2x that of the state as a whole and almost 1.5x that of the rest of the city (see below).

**Table 3: Race and Poverty** 

	Target Area	City of Tulsa	Okla.	U.S.A.
Poverty Rate (families) <sup>1</sup>	37.6%	20.8%	16.2%	14.6%
Race and Ethnicity <sup>1</sup>				
African American	11.68%	15.1%	7.4%	12.6%
American Indian	8.1%	4.3%	8.6%	0.9%
Hispanic or Latino	32.0%	15.8%	8.9%	16.3%
Median Household Income <sup>1</sup>	\$32,644	\$44,577	\$49.767	\$57,652

<sup>&</sup>lt;sup>1</sup> American Community Survey 5-year estimates at <a href="https://factfinder.census.gov/faces/nav/jsf/pages/community-facts.xhtml">https://factfinder.census.gov/faces/nav/jsf/pages/community-facts.xhtml</a> on American Fact Finder . Percent minority equals HISPANIC OR LATINO AND RACE population table (i.e., sum of Hispanic or Latino (or any race) and one race Black or African-American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, Some Other Race, and Two or More Races percentages).

#### (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Within the Target Area, death rates overall and for specific causes exceed those at the city, state, and national level as shown below:

**Table 4: Community Health** 

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	Target Area	City of Tulsa <sup>1</sup>	Okla.	USA
Deaths- All Causes/ 100K 1	1145.4 - 1717.4	881.3	910.6	731.9
Deaths-Heart Disease/100K <sup>1</sup>	282.4 - 398.4	216.3	228	169.8
Deaths—Cancer/100K <sup>1</sup>	347.2 - 465.5	185.7	185.4	163.2
Life Expectancy (years) <sup>1</sup>	68.5 - 71.9	76.0	76.1	77.2
<sup>1</sup> 2015 Tulsa County Health Department				

The causes of early mortality indicated may be related to exposure to hazardous materials. At the site, these hazards are currently limited to the areas within the structures frequented by maintenance workers and trespassers. Renovation or demolition activities prior to cleanup would expand the hazard to construction crews and the construction debris disposal facility.

#### (3) Disproportionately Impacted Populations

In 2018, Tulsa first published equality indicators for the city. "Geography and Life Expectancy" is one of the key indicators of Public Health being tracked. Our current understanding is that persons living in the northern portions of the city, reflective of the Target Area, can expect to live an average of 4.1-11.5 years less than a person from South Tulsa. Many

factors were found to influence this discrepancy, including environmental factors such as that addressed by this grant. Addressing health disparities between this and other areas of the city is Goal 2.2 of Tulsa's Resilience Strategy: "decreasing the life expectancy gap by 2024 by improving...health outcomes for all Tulsans". Addressing contamination in local structures such as this will help to reduce potential effects and improve the lives of individuals in this area of health inequality.

Further, the City of Tulsa's Brownfields Area-Wide Plan assessed the presence of brownfields in Census Tract 12 and found that this portion of the city disproportionately shares the negative environmental consequences resulting from industrial operations. This grant will address the reduction of the risk posed by contaminants at a local government property.

# 2.b. Community Engagement

## 2.b.i. Project Partners and Partner Roles

The City of Tulsa has developed strong involvement with a number of community-based organizations. A description of each organization and their role is included as follows:

Organization	Point of Contact	Role			
Tulsa City Council (No	Christa Patrick, District 3 City Councilor	Support outreach to affected			
letter, part of City)	Dist3@tulsacouncil.org, 918.596.1923	community.			
Tulsa Chamber of	Brien Thorstenburg, Vice President	Notify partners of economic			
Commerce	brienthorstenberg@tulsachamber.com	development opportunity at			
	918.560.0231	the site.			

Table 5: Project Partners & Roles

#### 2.b.iii Incorporating Community Input

A robust community involvement process is an inherent part of the City of Tulsa's brownfield program. Input from the community for this grant began with development of the Crutchfield Neighborhood Master Plan and later the Vision Tax vote meetings which identified redevelopment priorities. These have continued with progress reporting to the public regarding the status of the improvements and receiving input regarding ongoing community objectives.

Specific to this application, the City published a Community Notification Ad on its website and social media sites on November 12, 2019. In addition, a news release indicating the City's intent to submit a brownfields cleanup proposal and announcing a public meeting was published the same day. A public meeting was conducted on November 21<sup>st</sup> where citizens were able to provide comment on both the proposal and the Analysis of Brownfield Cleanup Alternatives (ABCA). Comments received during that process have been incorporated into this proposal. Details of this outreach are included in the Exhibits.

Future quarterly outreach would include a presence at or sponsorship of annual Tulsa Health & Wellness Expo or Kendall-Whittier Summer Mercado events to obtain community input on the planned project and address questions and concerns about environmental/health concerns. A translator will be proactively provided based upon community knowledge or as requested. Almost 16% of Tulsans speak a language other than English at home (City of Tulsa Fiscal Constraints, 2014) and the primary non-English language spoken in the Target Area is Spanish. Events will be conducted within or near the Target Area in a location with handicap access. The Tulsa City Council and Tulsa Chamber of Commerce will support the program by providing outreach to their stakeholders who include local business and real estate groups like the CCIM, NAIOP, and other groups focused on redevelopment. Events will be publicized through both our partners and through media releases, website updates, and social media.

Communicating progress will be accomplished through many different means to ensure the greatest coverage. A mixture of verbal, printed, and email will be used depending on the audience and information being communicated. All progress and successes will be communicated through the City of Tulsa's website and community meetings. A representative from City of Tulsa will attend community organization meetings upon request to provide project updates, program status, solicit input, and address questions/concerns.

# 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### 3.a. Proposed Cleanup Plan

The proposed cleanup would include full abatement, or removal, of ACM, LBP, and low-level radioactive paint identified in the 2019 Phase II within the specified areas. This would also include the evaluation and selection of additional Category I Non-friable ACM which has the potential to become friable or would otherwise limit future renovation efforts. It may also include selective demolition to fully expose hidden materials. There are three compelling reasons for full abatement and cleanup. First, this approach is the most effective choice in both achieving human health and environmental objectives and future site planning goals. Second, the resulting structure would be free of hazardous materials-related limitation to renovation and would not require the development of an Operations & Maintenance Plan for long-term use. Third, long-term liabilities and OHSA concerns relative to site work and contractors would also be mitigated. The implementation would require development of an Abatement Project Designs by an Oklahoma Licensed Project Designer and LBP Remediation Contractor. Licensed Asbestos and LBP Contractors would be secured to conduct the abatement. ACM and LBP would be sent to Oklahoma landfills licensed for these wastes. Low-level radioactive waste would require out-of-state shipment to the nearest licensed rad-waste facility, which is in Texas.

# 3.b. Description of Tasks/Activities and Outputs

# 3.b.i Project Implementation

In 2014 and 2017, the City of Tulsa completed asbestos abatement activities using State RLF and EPA Cleanup grants, respectively. The following tasks were used in each project and have proven to be an effective means of organizing project activities.

#### **Table 6: Tasks/Activities**

#### Task 1: Contract Award & Oversight.

- Upon award, the City would put into place the ABCA, Community Relations Plan (CRP), and Quality Assurance Project Plan (QAPP). These documents would be placed into a public accessible Administrative Record. An EP for design and quality assurance would also be selected. This task also includes fiscal and performance reporting, training, public outreach, and grant administration.
- Tulsa will coordinate with the library to provide Administrative Record access
- ii. Anticipated Project Schedule: 4-6 months plus Tasks 2-4.
- iii. Task/Activity Lead(s): City of Tulsa
- iv. Outputs: EP Selection, ABCA, CRP, and QAPP, 12 Public Outreach Events (1/Q)

#### Task 2: Project Design, Bid and Permitting;

 Asbestos Abatement Project Design would be developed in compliance with Oklahoma Administrative Code (OAC) 380:50, Abatement of Friable Asbestos Materials Rules and Approved Variance. Selective demolition would be designed to follow OAC 380:50-17-14. The Project Design and Bid Documents would be developed by a DOL-licensed Project Designer. A bid package would be issued from the City of Tulsa.

- Non-EPA related support during this task includes purchasing and facilities support for bidding and contracting.
- ii. Anticipated Project Schedule: 6-8 months.
- iii. Task/Activity Lead(s): City of Tulsa
- iv. Outputs: Abatement Design, Bid Docs, and Project Bid Award

## **Task 3: Project Implementation**

- Notification would be provided to the DOL regarding pending abatement activities.
   During abatement, additional materials may be found in pipe chases, ducts, and other inaccessible spaces. Monitoring will be continued throughout abatement and will be continuous during each shift. Final wipe and air samples will be conducted upon conclusion of abatement activities.
- Non-EPA activities during this task includes facilities and security support during project implementation.
- ii. Anticipated Project Schedule: 4-6 months.
- iii. Task/Activity Lead(s): City of Tulsa
- iv. Outputs: Abatement of ACM, LBP, and Low-Level radioactive material identified in Table 9.

## **Task 4: Project Closeout**

- This task would include disposal of cleanup waste, final inspection of the project and clearance by the DOL, final cleanup reporting, and close out with EPA.
- No non-EPA grant activities are anticipated during this task.
- ii. Anticipated Project Schedule: 4-6 months.
- iii. Task/Activity Lead(s): City of Tulsa
- iv. Outputs: DOL Closeout documents, Final Performance Report

The project schedule provides for completion in 18-24 months, well within the grant period.

#### 3.c. Cost Estimates

Based upon the Phase II ESA and the ABCA, an anticipated cleanup grant budget has been developed as shown below:

**Table 7: Project Budget Breakdown** 

Budget Categories Project Tasks (\$)						
		1	2	3	4	
	Personnel	-	-	1	1	-
ts	Fringe Benefits	-	1	1	1	-
Costs	Travel	\$11,000	1	1	ı	\$11,000
	Equipment	-	1	1	ı	=
Direct	Supplies	\$5,095	-	ı		\$5,095
	Contractual	-	\$20,000	\$255,572	ı	\$275,572
	Other	-	-	ı	ı	=
Tota	al Direct Costs			-		
Indi	rect Costs	-	1	1	-	-
Tota	al Federal Funding	\$16,095	\$20,000	\$255,572	1	\$291,667
Cos	t Share	\$45,159	\$3,068	\$4,090	\$6,016	\$58,333
Tota	al Budget	\$61,254	\$23,068	\$259,662	\$6,016	\$350,000

Travel fees would include attendance for two persons at one national brownfield conference (2\*\$3,000/trip) and two Region VI training sessions for one person (2x\$2,500/trip). Contractual fees are based upon estimates received from the ABCA preparer for preparation of cleanup plans (\$20,000), agency permitting and notifications (\$5,000), cleanup (\$200,000), 3<sup>rd</sup> party monitoring (\$15,572) and disposal (\$35,000).

A total of \$15,895 in federal and local funds have been budgeted for grant administration (labor and supplies) which is 4.5% (<5%) of the total award. Supplies are anticipated to include, two tablets (2 x \$500), one computer replacement (\$2,100) health and safety supplies for inspections (\$250), printing (3 x \$250/yr) and public outreach materials and venue fees (\$995). The proposed project would be entirely composed of hazardous substance cleanup with no use of petroleum funds. A detailed breakdown for the local soft match is provided below:

**Table 8: Local Cost Share Breakdown** 

Programmatic Costs	Unit Cost	Units	Total
Task 1: Fiscal & Performance Monitoring (16 hr/Q x 3 yrs)	\$51.13/hr	192 hr	\$9,817
Task 1: Training (40hrs/yr/person x 3 years)	\$51.13/hr	240 hr	\$12,271
Task 1: Outreach & Website Maintenance (20hr/Q x 3 yrs)	\$51.13/hr	240 hr	\$12,271
Task 2: Bidding and Site Walk Activities (60 hr)	\$51.13/hr	60 hr	\$3,068
Task 3: Cleanup Coor. & Inspections (20 hr/mon x 4 mon)	\$51.13/hr	80 hr	\$4,090
Task 4:DOL Closeout & Inspection (38 hr)	\$51.13/hr	38 hr	\$1,926
Task 4: Final Performance Reporting (80 hr)	\$51.13/hr	80 hr	\$4,090
Administrative Costs			
Task 1: Grant Administration (36hr/Q * 3 yrs)	\$25.00/hr	432 hr	\$10,800
Total Local Match			\$58,333

# 3.d. Measuring Environmental Results

Outputs for the Cleanup Grant include the abatement of the materials identified in Table 9 below. The outputs also include performance of at least 12 public outreach events to educate the public and provide an opportunity for input to the cleanup project. The activities outlined in this application address The EPA Strategic Plan (2018-2023) Long Term Performance Goal (LTPG) 1.3.2 to render one Brownfield Ready for Anticipated Use. This application also addresses LTPG 1.1.1 by addressing radioactive materials in the environment.

**Table 9: Project Outputs** 

Asbestos Abatement	Quantity
Thermal Systems	8,000 SF
Mastic	32,100 SF
Floor Tile	16,000 SF
Sealant	1,000 LF
Lead-Based Paint Abatement	Quantity
Wall Paint	15,000 SF
Door and Window Frames	80 LF
Windows	96 units
Staircase	1 unit
Low Level Radioactive Materials	Quantity
Stair Treads (Radioluminscent Paint)	16 treads
Outreach	Quantity
Community Involvement	12 events

The cleanup grant activities will be tracked on a monthly basis by the Project Director. Based upon progress to date, the Director will make adjustments to internal staffing or communications with abatement contractor to address any ongoing needs. The Project Director also provides weekly progress emails to the EPA Project Manager in addition to quarterly ACRES reporting. Financial tracking on a monthly basis will be provided by the City's Grants Accounting Department. The project spend is then reported through ACRES on a quarterly basis.

# **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

# 4.a. Programmatic Capability

## 4.a.i and 4.a.ii Organizational Structure and Key Staff

Michelle Barnett, P.E. in the Mayor's Office of Economic Development will serve as the Project Director responsible for day-to-day administration of the grant program including preparation and dissemination of public outreach, tracking project activities, and reporting. Ms. Barnett meets the requirements of a Qualified Environmental Professional (QEP) in accordance with 40 CFR 312.10. Mary Kell, AIA, Engineering Services Department, will support the grant by coordinating cleanup work with reuse and redevelopment planning. She has worked with the City brownfields program for over 10 years as program manager for renovation of Tulsa's most complex public facilities. Linda Ragsdale, Grant Finance, will also support the grant by tracking expenditures and providing information for quartering EPA and Federal reporting. Matt Liechti, Engineering Planning Manager, will support the grant in a senior management sponsorship.

## 4.a.iii Acquiring Additional Resources

The City of Tulsa maintains three competitively-competed local environmental consultant contracts for on-call work. If additional resources are needed design, monitoring, inspecting, or testing during the clean-up activities, these contractors can be immediately accessed to successfully complete the project. These contracts are valid through 2021 and will be recompeted after that time to ensure availability of additional resources.

# 4.b. Past Performance and Accomplishments

### 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

City of Tulsa is successfully managing several current EPA Brownfields grants and generating exceptional leveraging results. The current grants include a 2019 Cleanup Grant, 2018 Assessment Grant, three 2013 Cleanup Grants, and one 2013 Revolving Loan Fund Grant with 2016 and 2019 Supplemental Funding. The three 2013 Cleanup Grants (\$200,000 each) will be closed out in December 2019. This will provide additional capacity within the brownfields team for a new cleanup project.

#### (1) Accomplishments

The City of Tulsa's Brownfields Program has leveraged \$110 per federal dollar in cleanup and redevelopment from its 2010-2019 AWP, RLF and Cleanup grants. The City of Tulsa has demonstrated the ability to effectively administer EPA grants in an innovative and responsible manner and generate outstanding leveraging numbers.

Table 9: Summary of Past Performance and Leveraging (2010-2018)

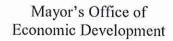
2010 Pilot Area Wide Planning Grant				
Award amounts	Accomplishments			
\$175,000	Identified "key" sites as catalysts for redevelopment.			
Dollars Leveraged	\$118,789,000 (Cleanup, infrastructure, and redevelopment)			
<b>Total Grant Funds Expended</b>	\$175,000			
2013 Brownfields Revolving Loan Fund Grant				
Award amounts	Accomplishments			
\$1,100,000	Abatement of asbestos in a multi-story office building			
Dollars Leveraged	\$2,155,000 in matching funds for cleanup to date.			
<b>Total Grant Funds Expended</b>	\$584,000 in loans made to date. Grant remains open.			
2013 Cleanup Grants (3)				
Award amounts	Accomplishments			
3 x \$200,000	Cleanup completed in 2019.			
Dollars Leveraged	\$20,000,000 is committed to USA-BMX headquarters in 2020.			
<b>Total Grant Funds Expended</b>	\$450,000. This grant will be closed out in December 2019.			
2018 Assessment Grant				
Award Amount	Accomplishments			
\$300,000	Since October 2018, three assessments completed.			
Dollars Leveraged	\$ NA			
<b>Total Grant Funds Expended</b>	\$ 65,000			
2019 Cleanup Grant				
Award Amount	Accomplishments			
\$600,000	Since October 2019, project designed and out for bid.			
Dollars Leveraged	\$NA			
<b>Total Grant Funds Expended</b>	\$NA			

#### (2) Compliance with Grant Requirements

City of Tulsa has the capacity to administer EPA Grant funds based on previous and current experience with federal grant management. City of Tulsa has a secure financial system in place and receives annual audits in accordance with accounting principles of the Governmental Accounting Standards Board. Grant awards are audited separately under the provisions of 2 CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" (Uniform Guidance). In the 2016-2017 audits there were no material weaknesses or audit findings identified in the "Independent Auditors' reports. City of Tulsa is experienced with selecting consultants in compliance with Federal grant requirements and will use its standard contractor selection procedure to ensure fair, open, and, qualifications based selection.

For all six grants listed above, the City of Tulsa maintained full compliance with work plans, grant agreements, quarterly progress reports requirements, reporting measures and financial status reporting requirements, MBE/WBE reporting requirements, and reporting project results through the ACRES database. All grant funds were expended for the closed grant.

Attachment 1 to Narrative Proposal: Cor	nmitment of Leveraged Resour	ces





November 27, 2019

Mr. Paul Johnson EPA Region 6 Regional Brownfield Program Coordinator 1201 Elm Street, Suite 1200 Dallas, Teas 75720

RE:

Letter of Commitment for City of Tulsa Grant Proposal EPA Cleanup Grant RFP No. EPA-OLEM-OBLR-19-07 CDFA No. 66.818

Dear Grant Program,

The City is committed to the success of brownfields redevelopment. To this end, we maintain a position for the brownfields program and anticipate this person will commit approximately 13% of their time, or 270 hours per year, over the 3-year grant cycle. In addition, we anticipate that an administrative assistant will contribute approximately 144 hours per year to the program and that training will be provided to a third staff member regarding the brownfields program for a total of 120 hours.

The citizens of Tulsa in 2013 and 2019 passed seven-year 1.1% sales tax extensions to fund a variety of capital improvements. Again in 2016 the citizens passed a 15-year 0.305% economic development tax. The City is currently working to improve major transportation in and around the site to include:

- \$1,680,000 for Street improvements on Trenton Avenue and connections
- \$1,787,000 for rehabilitation of Utica Avenue, the next arterial street.

The City of Tulsa is please to provide this letter of commitment of resources to be leveraged for the grant itself, as well as overall Vision Tulsa and Improve Our Tulsa redevelopment efforts. If you have any questions or if you need additional information, please do not hesitate to contact me at 918-596-7457 or <a href="mailto:mbarnett@cityoftulsa.org">mbarnett@cityoftulsa.org</a>.

Best regards,

Michelle Barnett

Deputy Chief of Economic Development

**Attachment 4 to Narrative Proposal:** 

**Threshold Criteria Response** 

# **Threshold Criteria Response**

- **1. Applicant Eligibility:** The City of Tulsa is a general purpose unit of local government: an Oklahoma municipality incorporated on January 18, 1898.
- **2. Previously Awarded Cleanup Grants:** The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
- **3. Site Ownership:** The parcel at 103 North Trenton (Building 104) was purchased by the City of Tulsa in 1993. The City of Tulsa is the sole owner of this site.

**4. Basic Site Information**: a) Building 104

b) 103 North Trenton, Tulsa, OK 74120

c) Owner: City of Tulsa

- **5. Status and History of Contamination at the Site:** a) This site is contaminated by hazardous substances.. b) The building was originally constructed as the regional headquarters for an oil-field equipment manufacturer in the 1920s but has been vacant since purchased by the City of Tulsa in 1993 due to perceived environmental conditions. c) Environmental concerns confirmed through a Phase II include asbestos, lead-based paint, and low-level radioactive materials. d) Asbestos and lead-based paint are present throughout the building as a result of normal construction practices of the time. Low-level radioactive materials are present in radio luminescent treads used on the basement stairs.
- **6. Brownfields Site Definition.**a) This facility **is not** listed (or proposed for listing) on the National Priorities List (NPL); b) this facility **is not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) this facility **is not** subject to the jurisdiction, custody, or control of the U.S. government.
- **7. Environmental Assessment Required for Cleanup Grant Proposals.** Assessments of this facility have included an ASTM E1903-11 compliant Phase II Environmental Site Assessment prepared under an EPA-approved QAPP in October 2019.
- **8. Enforcement or Other Actions.** There are no known inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens.
- **9. Sites Requiring a Property-Specific Determination.** This facility is not a special class of property that would require a "Property-Specific Determination" from EPA.
- **10.** Threshold Criteria Related to CERCLA/Petroleum Liability Criteria a(iii) Hazardous Substances Sites. The City of Tulsa is eligible for funding because the property was publicly owned and acquired prior to January 11, 2002. Please refer to the following:
  - (a) The City of Tulsa acquired the property through a General Warranty Deed.
  - (b) The City of Tulsa acquired the property on April 19, 1993.
  - (c) All disposal of hazardous substances at the site occurred prior to acquisition by the City of Tulsa.

- (d) The City of Tulsa has not caused or contributed to any release of hazardous substances at the site.
- (e) The City of Tulsa has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

# 11. Cleanup Authority and Oversight Structure

- (a) The City of Tulsa will enroll the cleanup of this site in the Oklahoma Department of Labor's Abatement Program for oversight of asbestos and lead-based paint and the Oklahoma Department of Environmental Quality Brownfields Program for oversight of low-level radioactive material cleanup.
- (b) Cleanup activities will not impact access to adjacent properties.
- **12. Community Notification.** The Community Notification documents required by this section are provided as Attachment 3 to the Narrative Proposal.
- **13. Statutory Cost Share.** The Cost Share Breakdown for our \$350,000 request is provided on page 8 of the Narrative Proposal and copied below:

Programmatic Costs	Unit Cost	Units	Total
Task 1: Fiscal & Performance Monitoring (16 hr/Q x 3 yrs)	\$51.13/hr	192 hr	\$9,817
Task 1: Training (40hrs/yr/person x 3 years)	\$51.13/hr	240 hr	\$12,271
Task 1: Outreach & Website Maintenance (20hr/Q x 3 yrs)	\$51.13/hr	240 hr	\$12,271
Task 2: Bidding and Site Walk Activities (60 hr)	\$51.13/hr	60 hr	\$3,068
Task 3: Cleanup Coor. & Inspections (20 hr/mon x 4 mon)	\$51.13/hr	80 hr	\$4,090
Task 4:DOL Closeout & Inspection (38 hr)	\$51.13/hr	38 hr	\$1,926
Task 4: Final Performance Reporting (80 hr)	\$51.13/hr	80 hr	\$4,090
Administrative Costs		•	
Task 1: Grant Administration (36hr/Q * 3 yrs)	\$25.00/hr	432 hr	\$10,800
Total Local Match			\$58,333

# Attachment 2 to Narrative Proposal: Letters of Commitment

Chamber of Commerce



November 26, 2019

City of Tulsa - Office of the Mayor Attn: Michelle Barnett, Deputy Chief of Economic Development 175 East 2nd Street, Suite 15-036 Tulsa, Oklahoma 74103

Re: Support for City of Tulsa EPA Grant Proposal Asbestos Clean Up of 103 North Trenton

On behalf of the Tulsa Regional Chamber I am writing to express our support for the City of Tulsa in their application for a grant for the clean-up of 103 North Trenton through the U.S. Environmental Protection Agency (EPA). Tulsa Regional Chamber is a principal business-driven leadership organization improving the quality of community through the development of regional economic prosperity. The Tulsa Regional Chamber fully supports the City's effort and intends to play a key role by communicating brownfield assessment opportunities like this to our members and stakeholders.

The Chamber supports these grant applications as they support common sense economic development efforts. It is critical to accomplish this and to have a vibrant welcoming city with healthy residents and areas ready for re-development. Brownfields in our community have had a negative effect on our region's ability to attract business and families. For this reason, brownfields assessments are very important for the City of Tulsa and potential investors in helping make decisions and financial forecasts regarding underutilized properties.

The Chamber is pleased to support the City of Tulsa's grant application with the EPA. We look forward to participating in this economic development effort for the benefit of our community. If you have any questions, please do not hesitate to contact us.

Sincerely,

William P. Murphy, CEcD

Senior Vice President, Economic Development

Tulsa Regional Chamber

Attachment 3 to Narrative Proposal: Public Engagement



# **ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA)**

# **Tulsa Surplus Yard Office Building 104**

103 North Trenton Avenue
City of Tulsa, Tulsa County, Oklahoma 74<u>1</u>20

A & M Project Number 2320-001-014

Version 1 / Revision Date - N/A

November 15, 2019

**Prepared For:** 



# City of Tulsa

Office of the Mayor 175 East 2<sup>nd</sup> Street, Suite 15-041 Tulsa, Oklahoma 74103

Ms. Michelle Barnett, P.E. (Deputy Chief of Economic Development)

Email: <a href="mailto:mbarnett@cityoftulsa.org">mbarnett@cityoftulsa.org</a>
Phone: (918) 596-7457



November 15, 2019

Ms. Michelle Barnett, P.E.

Deputy Chief of Economic Development
City of Tulsa
Office of the Mayor
175 East 2<sup>nd</sup> Street, Suite 15-041
Tulsa, Oklahoma 74103

A & M Project Number 2320-001-014

Email: mbarnett@cityoftulsa.org

Phone: (918) 596-7457

REF: Analysis of Brownfields Cleanup Alternatives (ABCA) for the Tulsa Surplus Yard Office Building

104 located at 103 North Trenton Avenue, City of Tulsa, Tulsa County, Oklahoma 74120.

Dear Ms. Barnett:

A & M Engineering and Environmental Services, Inc. (A & M) has prepared the enclosed Analysis of Brownfields Cleanup Alternatives (ABCA) for the above referenced site.

Thank you for choosing A & M. If you have any questions, feel free to contact us at (918) 665-6575 or via email.

Respectfully,

A & M Engineering and Environmental Services, Inc.

Jeff Elbert

**Director of Compliance** 

jelbert@aandmengineering.com

Enclosure

Jeff Jenkins, CIH, CSP Senior Industrial Hygienist

jjenkins@aandmengineering.com

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# **APPENDICES, TABLES, AND FIGURES**

**Appendices** 

Appendix A Project Figures

Figures (See Appendix A)

Figure 1 Site Map



#### 1.0 INTRODUCTION

#### 1.1 SITE DESCRIPTION

The Tulsa Surplus Yard, Building 104 (Building 104) is a two-story brick building with a partial basement. The building is currently utilized for storage and is estimated to be in good structural condition, except for a roof that appears to be leaking. The acoustical ceiling on the first and second floor has fallen in many areas of the building. The building was previously used for offices and thus is divided into offices and built-in cubicles. Windows are believed to be original to the building and the window frames have been painted. Permanent walls are of a concrete or plaster construction that is in fair to good condition in much of the building. The partial basement housed mechanical components. Visible water lines in the basement were uninsulated and served the rest of the building through a pipe chase under the first floor. The pipe chase was small and was not suitable for access. A Site map is provided in Appendix A (Project Figures).

#### 1.2 PREVIOUS SITE USE

The site was originally the headquarters for Dresser-Rand Industries. The City of Tulsa eventually took ownership of the property and has used the site as part of the Tulsa Surplus Yard facility. The City of Tulsa has primarily used Building 104 for storage of various items and materials.

#### 1.3 SITE ASSESSMENT FINDINGS

A & M Engineering and Environmental Services, Inc. (A & M) completed an Asbestos, Lead-Based Paint (LBP), and Radiation Survey (Survey) in Building 104 at the Tulsa Surplus Yard located at 108 North Trenton avenue, Tulsa, Oklahoma. The Survey Report was dated October 25, 2019.

The Asbestos Survey was conducted in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Asbestos (40 CFR Part 61, Subpart M). The following is a summary of the asbestos findings:

Asbestos Containing Materials	Asbestos Content	Quantity
Brown ceiling tile mastic	10% Chrysotile	16,000 SF
Tan and green 9"x 9" floor tile	10% Chrysotile	16,000 SF
Black floor tile mastic	5% Chrysotile	16,000 SF
Black wall mastic	10% Chrysotile	100 SF
White window sealant	5% Chrysotile	1,000 LF
SF: Square Feet; LF: Linear Feet;		

Lead Based Paint (LBP) regulations are provided by the United States Environmental Protection Agency (US EPA), and Department of Housing and Urban Development (HUD). The EPA and HUD regulate LBP in what is defined as target Housing and Child Occupied Facilities. The Occupational Safety and Health Administration (OSHA) regulates lead from a worker exposure position. A & M conducted an LBP Survey to determine if LBP existed in Building 104. The following is a summary of the lead findings:

Building Component	Color	Substrate	Location	Lead Conc. (ppm)	Quantity	Condition
Walls	White	Concrete/Plaster	Building Wide	> 1	15,000 SF	Poor
Door Frame	White	Wood	Entrances	> 1	80 LF	Poor
Window Frames	White	Metal	Building Wide	> 1	96 Windows	Poor
Stairs	White	Concrete/Plaster	Stairs	> 1	1 staircase	Poor
SF: Square Feet; LF: Linear Feet; ND: None Detected; NQ: Not Quantified						

Radiation was identified just slightly above background levels on the non-slip tread strips attached to the edge of the basement stairs. It is believed these non-slip tread strips at one time contained a luminesce agent.

#### 1.4 PROJECT GOALS

The goal of the cleanup is to restore the building to an office environment free of building hazards such as asbestos, LBP, and elevated radiation background levels.

#### 2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

#### 2.1 CLEANUP OVERSIGHT RESPONSIBILITTY

The cleanup of Building 104 will be managed by the City of Tulsa – Department of Economic Development under a Brownfields Cleanup Grant from the US EPA. A & M will oversee the cleanup work activity under their contract with the City of Tulsa. All documents prepared for this cleanup will be provided to the City of Tulsa – Department of Economic Development and subsequently the US EPA.

#### 2.2 CLEANUP STANDARDS

#### **Asbestos Laws and Regulations**

Currently two (2) federal agencies have been principally responsible for generating regulations for asbestos control. The two agencies are the OSHA and the USEPA.

The OSHA Construction Industry Standard (29 CFR 1926.1101) covers employees engaged in demolition and construction activities likely to involve asbestos exposure. In Oklahoma, the Oklahoma Department of Labor (ODOL) Asbestos Program enforces the Federal standards.

The EPA regulates asbestos application, removal, and disposal of asbestos, under the National Emission Standards for Hazardous Air Pollutants (NESHAP). The NESHAP protects the public and environment by minimizing the release of asbestos fibers during renovation and demolition activities. In Oklahoma the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (ODEQ) has been delegated authority to implement the NESHAP program for asbestos.

The ODOL and ODEQ are made aware of and provide oversight of asbestos removal projects by receiving and reviewing the "Notification of Intent to Renovate/Demolish" forms, which are required to be submitted a minimum of ten (10) working days prior to starting work.

Other agencies promulgating regulations on asbestos include the Department of Transportation (DOT) – establishing regulations regarding the transport of asbestos; and the National Institute of Standards and Technology (NIST) – establishing standards and protocols for laboratory accreditation. All cleanup work proposed at the property will comply with the above regulations and notification requirements. The proposed cleanup project will comply with all other applicable local, state, and Federal regulations not specifically mentioned.

## **Lead Based Paint Laws and Regulations**

LBP in pre-1978 housing and children-occupied buildings is regulated under the authority of the Toxic Substances and Control Act (TSCA; 15 U.S.C. 2601 et seq.) as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992, generally referred to as Title X (of The Housing and Community Act of 1992 - Public Law 102-550). Title X mandates the training, certification and licensing of LBP abatement contractors, inspectors, risk assessors, and the training and certification of abatement workers and project designers. The Act also amended the TSCA Section 402 & 403. The provisions of Title X apply to residential buildings and child-occupied facilities.

The USEPA issued a final rule regarding dangerous levels of lead in pre-1978 housing and children occupied buildings on January 5, 2001 (40 CFR Part 745). Under the new standards, lead is considered a hazard if there are greater than:

- 40 micrograms of lead in dust per square foot on floors;
- 250 micrograms of lead in dust per square foot on interior windowsills and;
- 400 parts per million (ppm) of lead on window troughs.

The OSHA has published regulations regarding worker safety during activities involving LBP abatement. The Construction Standard (29 CFR Part 1926) and the Occupational Safety and Health Standard (29 CFR Part 1910) promulgate a permissible exposure limit for lead construction workers, including workers performing demolition, salvage, or renovation of lead-containing materials at sections 1926.62 and 1910.1025 as follows:

• "The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m3) averaged over an 8-hour period." (29 CFR 1926.62)

Additional regulations under these chapters address other worker safety precautions such as respiratory protection programs, work practices, and medical monitoring.

LBP debris (material containing or surfaced with LBP) from commercial buildings may be classified as hazardous waste if lead concentrations exceed the Toxicity Characteristic Rule (40 CFR 261.24, 40 CFR 262.11) concentration limit of 5.0 mg/L in sample extract prepared according to the Toxicity Characteristic Leaching Procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846.

#### 2.3 MISCELLANEOUS REGULATIONS APPLICABLE TO THE CLEANUP

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields revitalization Act, the Federal Davis-Bacon Act, Oklahoma Department of Environmental Quality (ODEQ) environmental regulations, ODOL asbestos regulations, and US EPA LBP regulations. Federal, state, and local laws and regulations regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits and notifications will be obtained or made prior to the cleanup work activity beginning.

#### 3.0 CLEANUP ALTERNATIVES

#### 3.1 CLEANUP ALTERNATIVE #1 (NO ACTION)

The No Action Alternative would leave building conditions as they currently are, with asbestos and deteriorating LBP within the building potentially presenting an inhalation and/or consumption risk to future building occupants. There are no financial costs to this alternative.

This alternative is not protective of human health or the environment, does not meet the cleanup standards for state or Federal regulatory agencies; and is not compatible with unrestricted development and use of the building. For these reasons, this alternative has been eliminated.

# 3.2 CLEANUP ALTERNATIVE #2 (LEAVE ASBESTOS AND ABATE LEAD BASED PAINT)

The identified asbestos is a Category 1 non-friable material (mastics, caulking, and floor tile), thus allowing the possibility of leaving the asbestos in place and managing it under an Operations and Maintenance (O & M) Program. Actual renovation plans may not allow the ACM to remain. The LBP is in poor deteriorating condition (flaking) and must be abated. Interim controls (enclosure or encapsulation (painting over)) for LBP is not feasible due to its current condition.

This option is expected to be \$50,000 to \$65,000 but would have ongoing additional costs for O & M Program development and implementation. An O & M plan would need to be approved by ODOL prior to implementation.

The building will be cleared by monitoring of residue and the air for lead at the conclusion of the LBP abatement.

### 3.3 CLEANUP ALTERNATICE #3 (ABATE ASBESTOS AND LEAD BASED PAINT)

Asbestos abatement work will be performed according to the OSHA requirements of Code of Federal Regulation 29 CFR 1926.1101, the Asbestos Construction Standard, adopted by reference in Oklahoma as OAC 380:50. Work activities will also meet the criteria of the ODOL and the NESHAP 40 CFR Part 61 for regulatory notification of intent to renovate or demolish. The NESHAP requirements for asbestos identification, adequate wetting, no visible emissions, and proper waste packaging for disposal will also be followed. Abatement contractors will be licensed by the ODOL and contractor personnel will be accredited by ODOL.

A biddable specification package will be prepared to include all necessary design drawings, technical specifications, and general requirements. The package will be suitable for bidding purposes to secure a contractor to implement the cleanup, as applicable. As necessary, subsequent investigation may be conducted to further characterize asbestos prior to release of the specification. The approved contractor will submit a joint Notification of Intent to Renovate/Demolish (Notification) form to the ODEQ, Air Quality Division and the ODOL Asbestos Program in advance of asbestos abatement. The Notification will be submitted ten (10) working days prior to on-site activities. The Notification will summarize the project description, schedule, approved contractor, facility owner, disposal location, and engineering controls, etc. After asbestos abatement activities are completed, final air clearance samples will be collected to verify adequate abatement activities. The final air clearance criterion established by specification for this project is the level referenced in 40 CFR Part 763, Subpart E, of the US EPA Asbestos in Schools Rule of 0.01 fibers per cubic centimeter of air or the background level measured before the start of abatement. Clearance samples will be analyzed by phase contrast optical microscopy. Properly trained and equipped personnel shall perform all work.

The deteriorating LBP will be removed using clean lead practices which will involve the scraping paint that has been wetted with a Trisodium phosphate (TSP) solution from the walls and windows. Peel away paint removers may be required for difficult areas. Areas that can have the substrate easily replaced (i.e. drywall, paneling, etc.) will have the substrate and paint removed as a single unit. The remediation area will be washed with TSP and High Efficiency Particulate Air (HEPA) vacuumed.

Prohibited methods will include dry scraping, chemical (methylene chloride) stripping, heat guns, sandblasting, and other methods that generate dust.

The area will be tested for left behind residue and acceptable airborne levels following remediation.

This option is expected to be \$135,000 to \$170,000 but would have ongoing additional costs for O & M Program development and implementation. The Asbestos Abatement alternative is recommended as it is compatible with regulatory requirements, the goals of reducing the environmental threats to human health and the environment, as well as future redevelopment of the subject property.

# 3.4 RECOMMENDED CLEANUP ALTERNATIVE

Option #. 3, Asbestos Abatement and LBP is recommended for implementation at the subject property, as it is easily implemented, will mitigate risks to human health and the environment, is compatible with regulatory requirements, and will provide a long-term cleanup response supporting redevelopment of the subject property.

Although easily implemented, it has been determined that Option # 1 the No Action alternative is not compatible with regulatory requirements or the goals of reducing the environmental threats to human health and the environment and future redevelopment of the subject property. Option 2 would leave behind asbestos materials that would need to be maintained and handled properly.

#### 4.0 REPORTING/DELIVERABLES

After US EPA acceptance of the ABCA, the following deliverables are required under the EPA Brownfields Cleanup Grant:

# Prior to Cleanup

- Community Relations Plan;
- Responses to public comment;
- Asbestos Project Design and ODOL Approval
- LBP Project Design

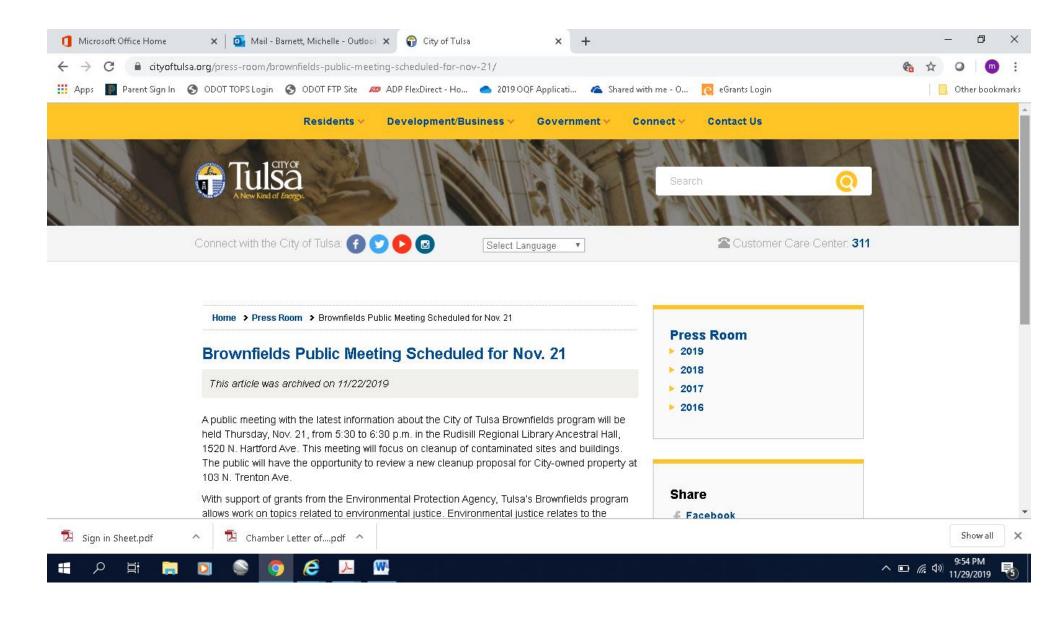
### **Upon Completion of Cleanup**

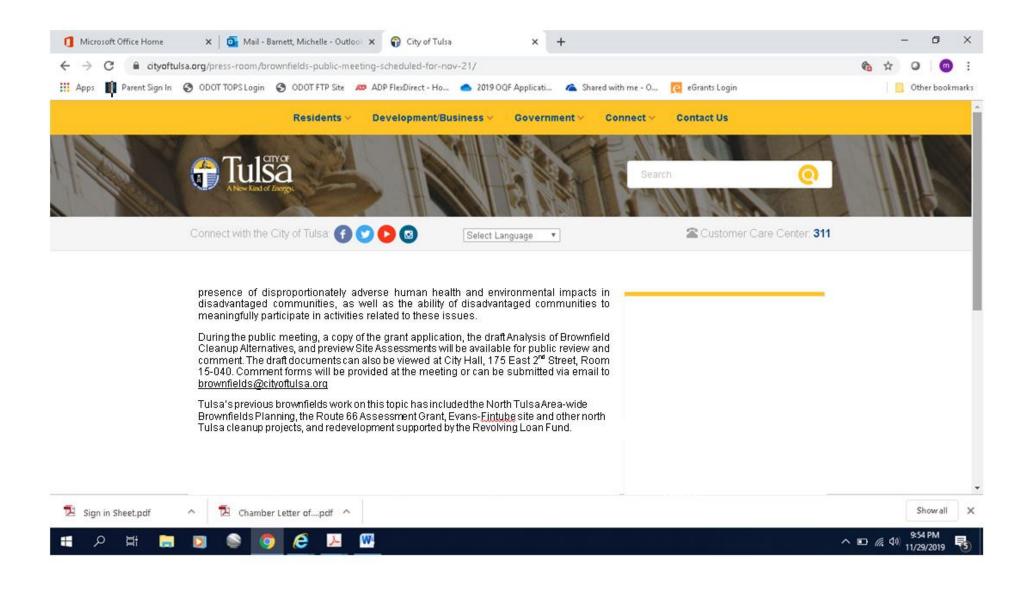
- Project monitoring records
- TCLP Analysis of LBP Waste
- Project completion report with a narrative of cleanup operations, waste manifests, and confirmation of removal sampling results; and

#### 5.0 HEALTH AND SAFETY PLAN

A Health and Safety Plan (HaSP) complying with OSHA 29 CFR 1910.120 entitled "Hazardous Waste Operations and Emergency Response" will be created and implemented prior to any cleanup (remediation) activity.







# Brownfields Public Meeting November 21, 2019 Questions and Comments



No comments to the
ABCA Walt as the
draft Application were
Whered
- Michaele
Paris Paris
Name:
Address/Email:
If you have additional comments or questions, please send us an email to: BrownFields@CityofTulsa.org

## UNCOVER THE POSSIBILITIES CITY OF TULSA BROWNFIELDS PROGRAM

### **Environmental Justice and Contaminated Sites**

November 21, 2019

Rudisill Regional Library

5:30-6:30 pm



# What is Environmental Justice?

**EPA Environmental justice (EJ)** Goal: To provide an environment where all people enjoy the same degree of protection from environmental and health hazards and equal access to the decision-making process to maintain a healthy environment in which to live, learn, and work.

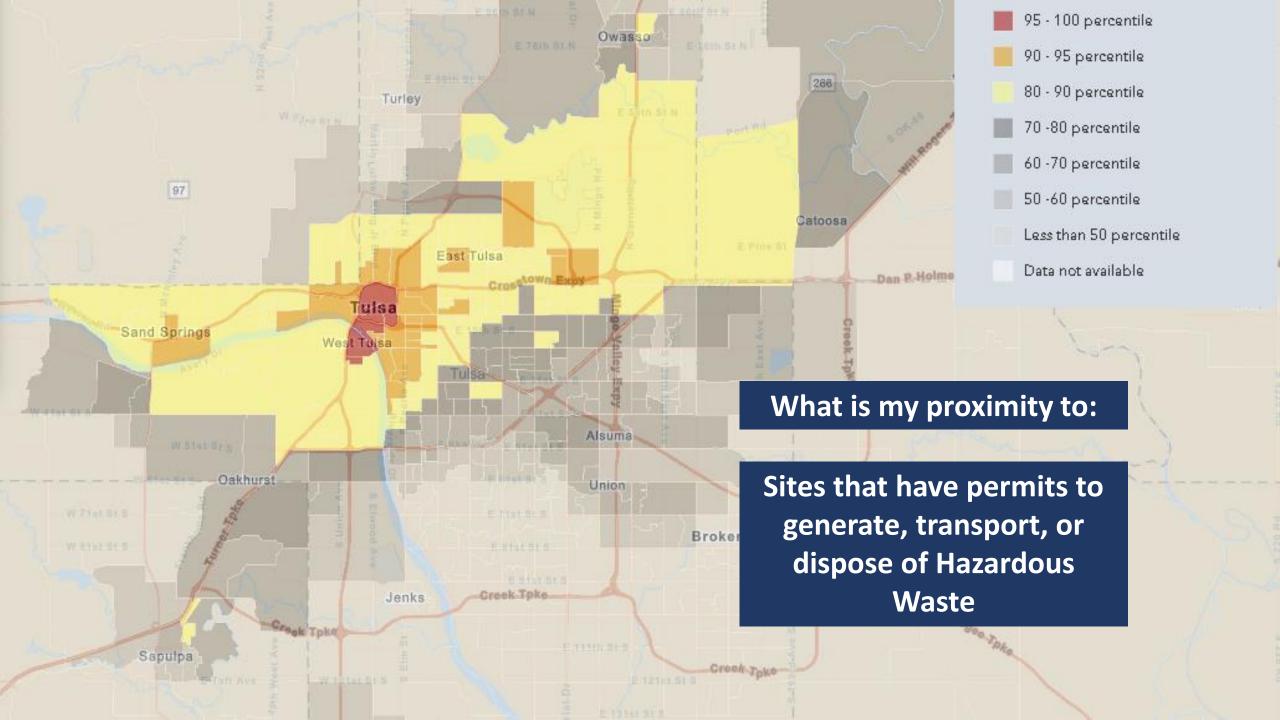
**Environmental justice (EJ)** is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

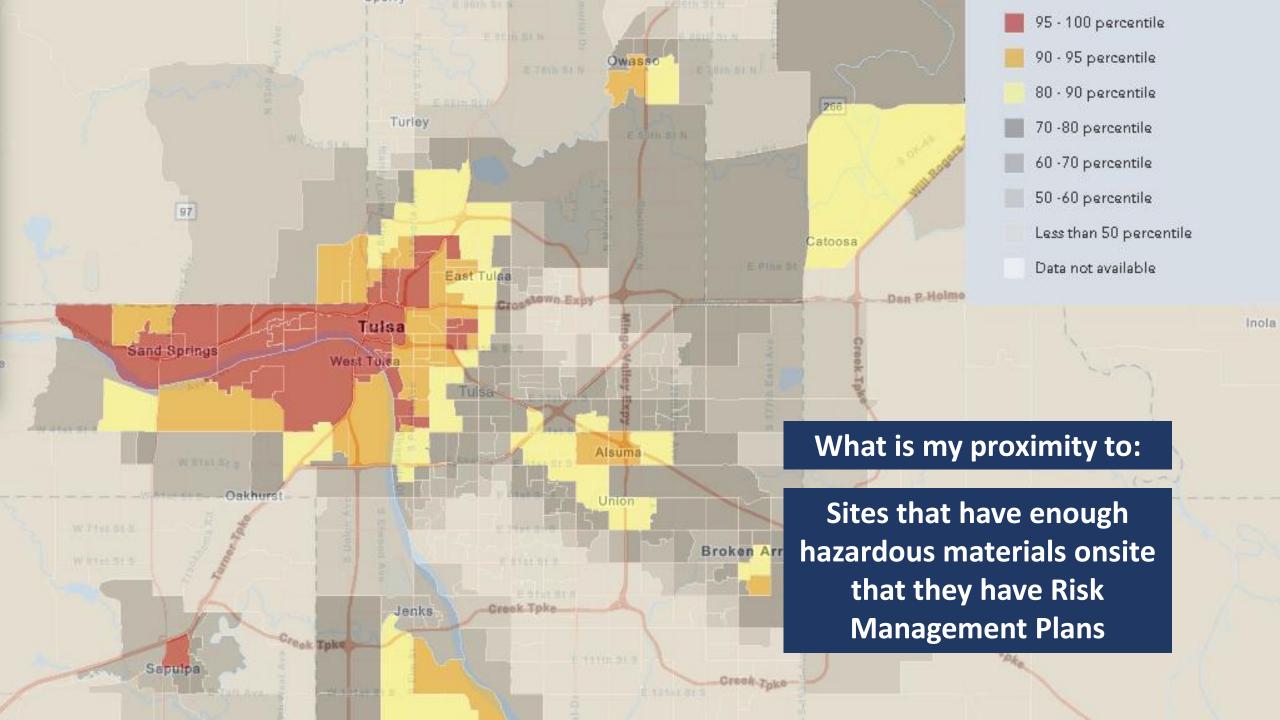
**Fair treatment** means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Where are Environmental Hazards located in my community?

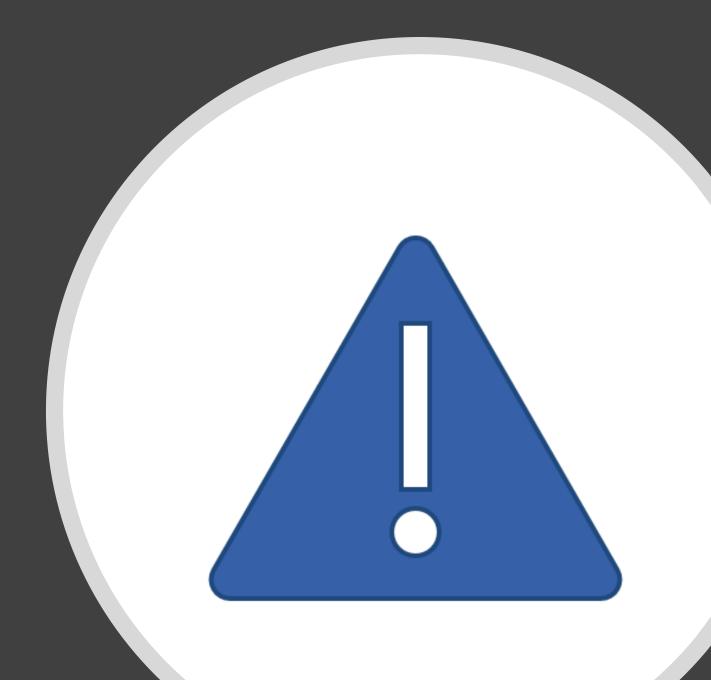


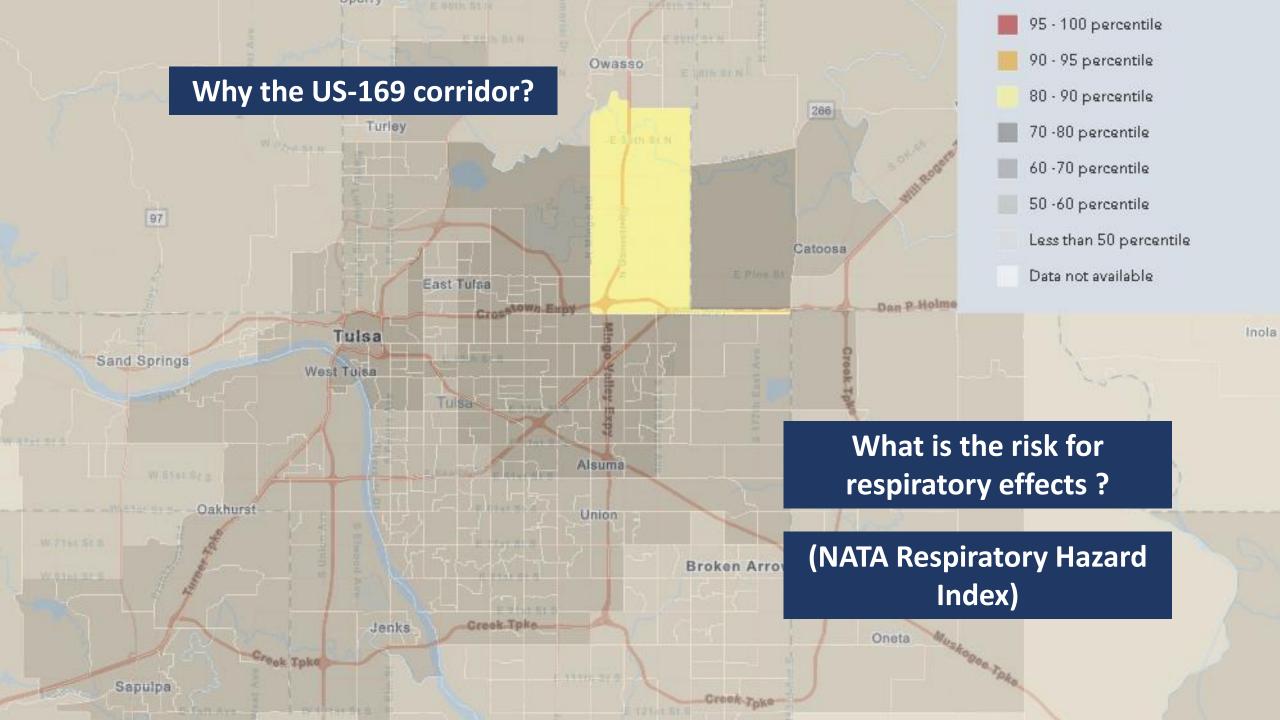


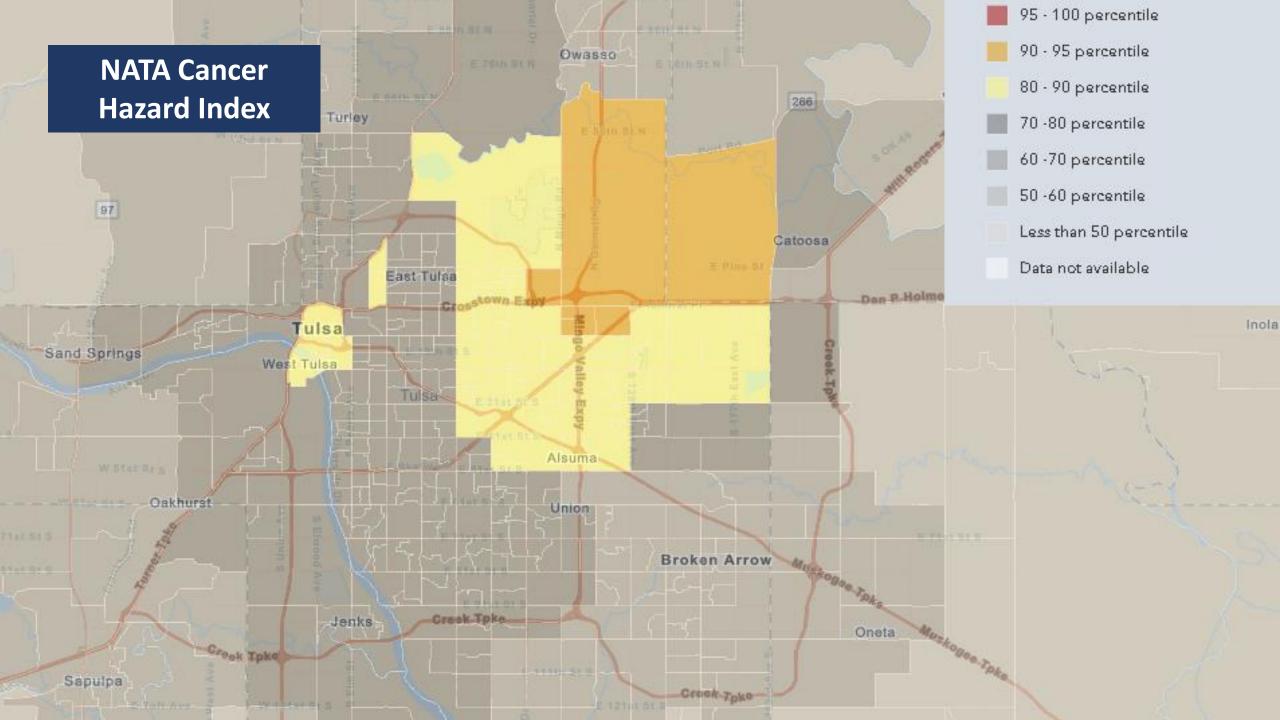




Where are the risks of adverse impacts in my community?

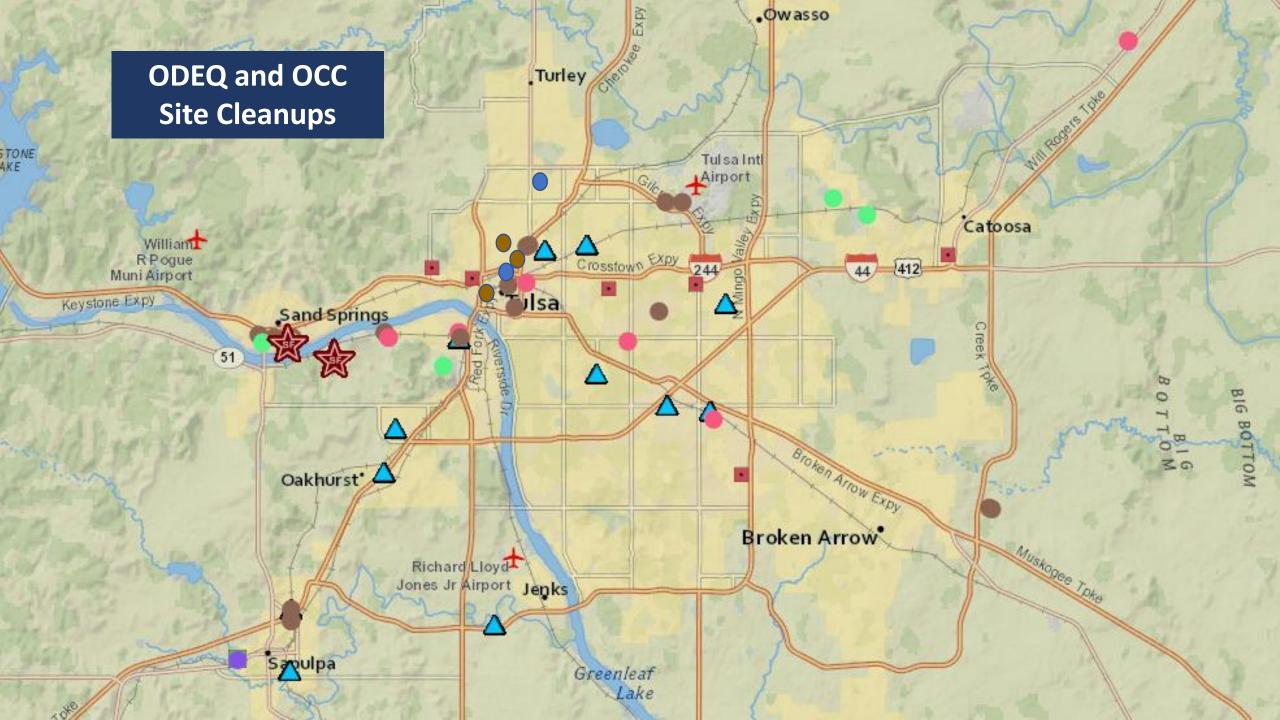


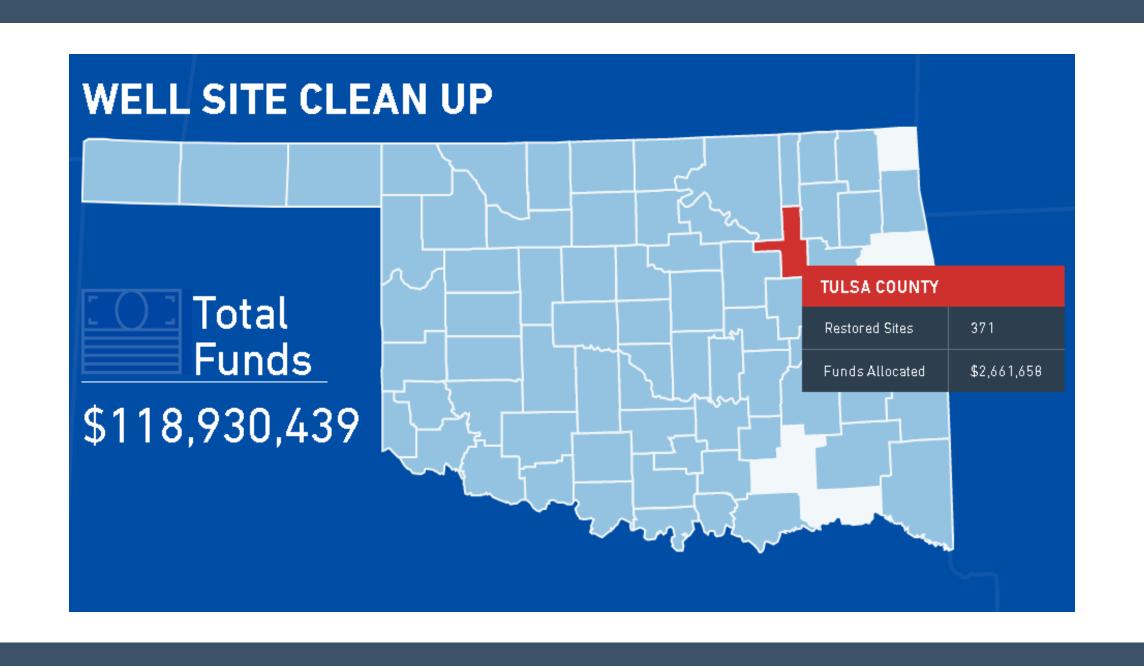




What is being done about contaminated properties in my community?





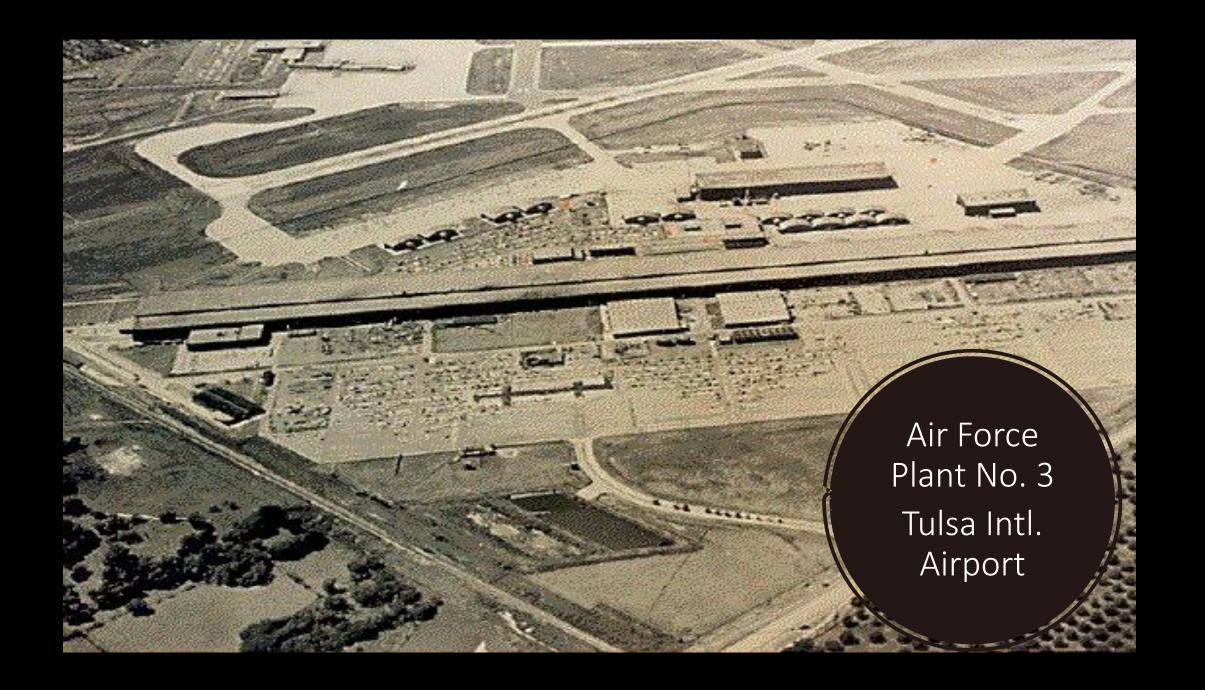




















Proposed Cleanup: 103 N. Trenton





Proposed Cleanup: 103 N. Trenton





Proposed Cleanup: 103 N. Trenton



#### ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA)

#### Tulsa Surplus Yard Office Building 104

103 North Trenton Avenue City of Tulsa, Tulsa County, Oklahoma 74<u>1</u>20

A & M Project Number 2320-001-014

Version 1 / Revision Date - N/

November 15, 201

Prepared For



City of Tulsa Office of the Mayor 175 East 2<sup>nd</sup> Street, Suite 15-041 Tulsa, Oklahoma 74103

Ms. Michelle Barnett, P.E. (Deputy Chief of Economic Development)

Email: mbarnett@cityoftulsa.org Phone: (918) 596-7457 Copies of the Draft Analysis of Brownfield Cleanup Alternatives are available for review on the back tables.

Comment forms are provided as well.

What opportunities are there for identifying and cleaning up contaminated properties in my community?



## **Assessment Services**

The City of Tulsa's Brownfields Program provides free services to assist with the assessment and cleanup of environmental contamination at abandoned, idle or underused industrial or commercial facilities or sites. This program helps convert contaminated sites into productive properties that are attractive and ready for redevelopment.



## Brownfields Revolving Loan Fund

The Brownfields RLF provides qualified applicants with funding to clean up contaminated properties. The money is dispersed in the form of low interest loans. As the low interest loans are repaid, the loan amount is returned into the RLF and re-lent to other borrowers, providing an ongoing source of lending capital within the city of Tulsa.



# UNCOVER THE POSSIBILITIES CITY OF TULSA ROWNFIELDS PROGRAM

Michelle Barnett, PE, Program Manager

Deputy Chief of Economic Development

918-596-7457

mbarnett@cityoftulsa.org

https://www.cityoftulsa.org/economic-development/opportunities-and-incentives/brownfields/



A New Kind of Energy.

# **Brownfields Public Meeting**

Location: Rudisill Regional Library

actions note emeterno tondetion con nwise & Ksg. obsign Date: November 21, 2019 E-MAIL 4870 211-8110-8201 91808910 7457 106 PHONE/ADDRESS 000 Moch NAME (Please Print) Mark

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for Federal Assista	ance SF-424		
* 1. Type of Submission:  Preapplication  Application  Changed/Corrected Application	* 2. Type of Application:  New Continuation Revision	* If Revision, select appropriate letter(s):  * Other (Specify):	
* 3. Date Received: 12/03/2019	4. Applicant Identifier:		
5a. Federal Entity Identifier:		5b. Federal Award Identifier:	
State Use Only:			
6. Date Received by State:	7. State Application	n Identifier:	
8. APPLICANT INFORMATION:			_
* a. Legal Name: City of Tulsa			]
* b. Employer/Taxpayer Identification Nu	umber (EIN/TIN):	* c. Organizational DUNS: 0786622510000	_
d. Address:		1	_
* Street1: 175 E 2nd Str	reet		
* City: Tulsa			
County/Parish: Tulsa			
* State:		OK: Oklahoma	
* Country:		USA: UNITED STATES	
* Zip / Postal Code: 74103-3026			
e. Organizational Unit:			_
Department Name:		Division Name:	_
Office of Economic Developme	ent		
f. Name and contact information of p	person to be contacted on n	natters involving this application:	
Prefix: Mrs.	* First Nam	ne: Michelle	]
Middle Name:			
* Last Name: Barnett			
Suffix:			_
Title: Deputy Chief of Economi	ic Development		
Organizational Affiliation:			
* Telephone Number: 918-596-7457	7	Fax Number:	7
*Email: mbarnett@cityoftulsa.			_

Application for Federal Assistance SF-424					
* 9. Type of Applicant 1: Select Applicant Type:					
C: City or Township Government					
Type of Applicant 2: Select Applicant Type:					
Type of Applicant 3: Select Applicant Type:					
* Other (specify):					
* 10. Name of Federal Agency:					
Environmental Protection Agency					
11. Catalog of Federal Domestic Assistance Number:					
66.818					
CFDA Title:					
Brownfields Assessment and Cleanup Cooperative Agreements					
* 12. Funding Opportunity Number:					
EPA-OLEM-OBLR-19-07					
* Title:					
FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS					
13. Competition Identification Number:					
Title:					
At Average Many III. Design (Otton Country Otton Country O					
14. Areas Affected by Project (Cities, Counties, States, etc.):					
Add Attachment Delete Attachment View Attachment					
* 15. Descriptive Title of Applicant's Project:					
Cleanup of asbestos, lead-based paint and low-level radioactive materials from 103 North Trenton					
in Tulsa, Oklahoma to address environmental hazards and allow reuse in local economic development.					
Attach supporting documents as specified in agency instructions.					
Add Attachments Delete Attachments View Attachments					

Application for Federal Assistance SF-424								
16. Congressional	Districts Of:							
* a. Applicant	0K-001			* b. Program/Project OF	K-001			
Attach an additional	list of Program/Project Co	ongressional Distric	ts if needed.					
			Add Attachment	Delete Attachment	View Attachment			
17. Proposed Proj	ect:							
* a. Start Date: 10	/01/2020			* b. End Date: 0	9/30/2023			
18. Estimated Fun	ding (\$):							
* a. Federal		291,667.00						
* b. Applicant		58,333.00						
* c. State		0.00						
* d. Local		0.00						
* e. Other		0.00						
* f. Program Income		0.00						
* g. TOTAL		350,000.00						
* 19. Is Application	Subject to Review By	State Under Exec	cutive Order 12372 Pro	cess?				
a. This applica	tion was made available	e to the State unde	er the Executive Order	12372 Process for review	on			
b. Program is	subject to E.O. 12372 b	ut has not been se	elected by the State for	review.				
c. Program is r	not covered by E.O. 123	c. Program is not covered by E.O. 12372.						
* 20. Is the Applica	nt Delinquent On Any	Federal Debt? (If	"Yes," provide explan	nation in attachment.)				
	nt Delinquent On Any	Federal Debt? (If	"Yes," provide explan	ation in attachment.)				
Yes		Federal Debt? (If	"Yes," provide explan	nation in attachment.)				
Yes	No	Federal Debt? (If	"Yes," provide explan	Delete Attachment	View Attachment			
If "Yes", provide extended to the second of	No xplanation and attach is application, I certify omplete and accurate esulting terms if I accelling, civil, or administr	(1) to the statement to the best of mention pt an award. I amentive penalties. (U	Add Attachment  ents contained in the hy knowledge. I also have that any false, for J.S. Code, Title 218, Second	Delete Attachment  list of certifications** and provide the required assistitious, or fraudulent sta	I (2) that the statements surances** and agree to atements or claims may			
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If "Yes", provide example 21. *By signing the herein are true, comply with any resubject me to crim  ** I AGREE  ** The list of certific specific instructions.	No explanation and attach is application, I certify omplete and accurate esulting terms if I accellinal, civil, or administrations and assurances,	(1) to the statement to the best of ment an award. I ame ative penalties. (U	Add Attachment  ents contained in the hy knowledge. I also have that any false, for J.S. Code, Title 218, Second	Delete Attachment  list of certifications** and provide the required ass ictitious, or fraudulent statection 1001)	I (2) that the statements surances** and agree to atements or claims may			
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